

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Search of

U.S. Postal Service Priority Mail parcel bearing label no. 9405 8036
9930 0812 1560 94 addressed to, Terra Kline, PO Box 489, 2 Reservoir
Rd., St. Clairsville, OH 43950-4000, with a return address of, Terra
Kline, 2306 Stuart Ave., Albany, GA 31707-1731.

Case No.

2:22-mj-535

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:
See Attachment A

located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1).

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
21 U.S.C. § 841(a)(1)

Offense Description
Distributing and possessing with intent to distribute controlled substances

The application is based on these facts:

As set forth in the attached Affidavit of U.S. Postal Inspector Jarrett W. Arrington

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days *(give exact ending date if more than 30 days)*: _____ is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Jarrett W. Arrington, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, after a PDF was submitted via electronic mail. *(specify reliable electronic means)*:

Date:

8/3/2022

City and state: Columbus, Ohio



Judge's signature
Elizabeth A. Preston Deavers, U.S. Magistrate Judge
Printed name and title

STATE OF OHIO)
) SS:
COUNTY OF BELMONT)

UNITED STATES POSTAL INSPECTION SERVICE

AFFIDAVIT

I, Jarrett W. Arrington, being first duly sworn on oath, depose and state the following:

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of a United States Priority Mail parcel— described in Attachment A, which is currently in law enforcement possession.
2. I am a United States Postal Inspector assigned to the Macon Field Office. I have been employed as a Postal Inspector for over 12 years. As part of my duties, I investigate the use of the United States Mail to transport non-mailable matter, to include controlled substances such as cocaine, heroin, marijuana, and methadone in violation of Title 21, United States Code, Sections 841(a) and 846. I have participated in investigations which have resulted in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of the illegal drugs and proceeds from the sale of those illegal drugs.
3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.
4. This affidavit is made in support of an application for a search warrant to search United States Priority Mail parcel as follows:

Sender: Terra Kline
 2306 Stuart Avenue
 Albany, GA 31707-1731

Addressee: Terra Kline
 P O Box 489
 2 Reservoir Rd
 St Clairsvle OH 43950-4000

Tracking Number: 9405-8036-9930-0812-1560-94

Weight: 1 lb. 0 ozs

Size: 6" X 9" manila envelope

5. On July 27, 2022, affiant was contacted by Lieutenant Jason Carter with the Dougherty County Sheriff's Office. Lieutenant Carter has over 16 years of law enforcement experience in Albany, Georgia with the Dougherty County Sheriff's Office and is assigned to the Criminal Investigation unit of the Dougherty County Sheriff's Office. Lieutenant Carter informed affiant he is investigating a Violation of Oath of Office, Possession of Marijuana W.I.D, Possession of a Firearm during a Commission of a Crime, and Violation of the Georgia Racketeering and Corrupt Organizations (R.I.C.O.) Act Case.
6. Lieutenant Carter contacted affiant due to information he developed indicating a United States mail parcel was going to be placed in the mail stream that he believed would contain narcotics. Lieutenant Carter provided background information that is detailed below:
7. The investigation started on June 26, 2022, when Lieutenant Carter was contacted by Major Allen Brock regarding Detention Officer Maurice Mathis having had several recorded conversations with inmate Matdrick Giddens in reference to attempting to bring contraband to him inside the Dougherty County Jail facility. At the start of this investigation, inmate Giddens was in the disciplinary unit. Captain Jerroma Williams had been reviewing jail cameras when he discovered Detention Officer Mathis having several conversations with inmate Giddens where inmate Giddens had questioned Detention Officer Mathis, wanting to know when he was going to bring the stuff, which in my training and experience refers to contraband. Capt. Williams told Lieutenant Carter that Detention Officer Mathis had several interactions between June 24, 2022, and June 25, 2022, with inmate Giddens discussing Detention Officer Mathis bringing contraband to inmate Giddens. This information was based on audio and video surveillance in the facility.
8. A search warrant was executed for Detention Officer Mathis and his residence on June 30, 2022, and more correspondence between Mathis and other inmates, and known gang members was located at his residence. The correspondence were handwritten letters that had originated from various inmates at the facility. Also, marijuana, one handgun, and \$6500 were recovered during the search of Mathis's residence. During Lieutenant Carter's investigation, the phone number (229) 499-0360 was found in the cell phone belonging to Mathis. Mathis

- was advised of his Miranda Rights, and he initialed and signed his Miranda Waiver Form and agreed to answer questions without a lawyer present. Mathis then advised the number located in his phone belonged to Terra Kline.
9. Lieutenant Carter was later advised Terra Kline was a former nurse at the Dougherty County Jail Facility and had been released after discovering her relationship with known inmate and gang member Matdrick Giddens. A phone call between Giddens and various family members was intercepted through the inmate phone system at the detention facility. In the phone call, Giddens gave his family members the phone number for Kline as (229) 499-0360 and instructed them to call Kline in order to get her to conduct business for him.
 10. On July 13, 2022, at approximately 0845hrs, Lieutenant Carter contacted Kline via phone at (229) 499-0360. A person answered the phone, and Lieutenant Carter asked was this Terra Kline. She stated yes. Lieutenant Carter introduced himself and advised her that he needed to speak with her regarding a current investigation. Kline stated she was out of town and would not return for several weeks. Kline, after a few minutes of talking with Lieutenant Carter, stated she would get back to him when she could come to meet with him to discuss the case. At approximately 1524hrs, Lieutenant Carter received a text message from Kline stating she would return to town (Albany, Ga) on July 27, 2022. Lieutenant Carter advised her he would see her on July 28, 2022, and she stated, "ok." Contacting Kline on the number listed above shows she is still in possession of the phone number previously given by Giddens to his various family members for Kline. Lieutenant Carter later discovered that Kline was on the phone with Giddens during his conversation with her. Lieutenant Carter was able to determine this information because the inmate phone calls at the detention facility are recorded and he was able to hear the conversation through one of Giddens phone recordings.
 11. During this investigation, Lieutenant Carter has found numerous phone calls between Kline and Giddens that have been recorded since inmate Giddens was moved to a jail in Macon, Ga. During these conversations, Kline was heard talking with Giddens. He was advising her to use Cash App to pay people to take care of different deals.
 12. Based on recorded jail phone conversations and text messages, since Giddens has been moved to Bibb County Jail, Macon, Ga, Kline has continued to have contact with Giddens passing messages, and coded information, to his fellow gang members outside the jail that are currently in his affiliated gang. Kline has made reference to having multiple phones to conduct business for Giddens, and that she believes that one of her

phones is "tapped", and she doesn't do any business on that phone any longer. She has also said her daughter's phone may be "tapped" as well. Giddens has made reference to Kline via phone about sending pills to her to sell through the United States Postal Service for her to sell. Kline has made reference to receiving other such packages from other unknown subjects and having established a market to sell the pills. Kline has also stated she has sold "5 for 12," which in my training and experience means 5 pills for \$12.00 a piece. Giddens has also made reference to this fact with other known parties as well and that he is using Kline to sell the pills. Kline did state she sent a package label to Giddens's associate in Albany, Ga. so they could send the package to her. Giddens's associate did confirm they mailed the package on July 27, 2022.

13. On July 28, 2022, Kline had a conversation with Giddens and confirmed a parcel was enroute to her post office box in Ohio. This conversation was recorded on the inmate phone system at the detention facility and monitored by Lieutenant Carter. Kline has commented she has the postal application updating her when a parcel is delivered.
14. Your Affiant conducted a search of public records databases for the address Post Office box 489, St. Clairsville, OH 43950, and learned this is a valid post office box in the name of Terra Kline. The post office box was opened June 27, 2022, and it is scheduled to expire on September 26, 2022. Your Affiant also conducted a public records search for the sender's address of 2306 Stuart Avenue, Albany, GA 31707 and determined the location was previously rented by Kline.
15. Your affiant knows from training, experience, and drug trafficking intelligence that the United States Postal Priority Mail is frequently utilized by drug traffickers for shipment of illegal narcotics or illegal drug proceeds. The use of Priority Mail is favored because of the reliability and speed, as well as the perception narcotics shipped in this manner are less likely to be detected by law enforcement. In addition, Priority Mail parcels can be tracked via the internet to allow the shipper to verify the item was delivered.



16. Based on the facts set forth in this affidavit, your affiant submits that this affidavit supports probable cause for a search warrant authorizing the search of the parcel identified and further described in Attachment A. Therefore, your affiant seeks the issuance of a search warrant directing the search of this envelope and the seizure of contraband and evidence and fruits of the crime of Distributing and Possessing With Intent to Distribute Controlled Substances, in violation of 21 U.S.C. § 841(a)(1).

Respectfully submitted,



JARRETT W. ARRINGTON
United States Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me on this day of August 23, 2022, in Columbus, Ohio. |

ELIZABETH A. PRESTON DEAVERS
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

The property to be searched is a United States Postal Service Priority Mail parcel addressed to, Terra Kline P O Box 489, St Clairsville, OH 43950-4000, with a return address of, Terra Kline, 2306 Stuart Ave., Albany, GA 31707-1731 bearing USPS tracking number 9405-8036-9930-0812-1560-94. The parcel is currently in the custody of the United States Postal Inspection Service.